

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY, et al.

Defendants.

Case No. 22-cv-02435 (LLS)(SN)

**PLAINTIFF'S NOTICE OF
MOTION FOR SUMMARY
JUDGMENT**

TO THE HONORABLE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT, Plaintiff Lynne Freeman, through her undersigned counsel, upon the accompanying Memorandum of Law, Declarations of Stephen M. Doniger and Lynne Freeman, respectfully moves the Court before the Honorable Louis L. Stanton, U.S.D.J., at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 21C, New York, New York 10007, for summary judgment in favor of Plaintiff pursuant to Fed. R. Civ. P. 56 with respect to the cause of action contained in the Complaint and for such other and further relief as the court deems proper.

PLEASE TAKE FURTHER NOTICE that Plaintiff respectfully requests oral argument if this motion is opposed pursuant to Section 2.E. of the Court's Individual Rules.

Dated: November 21, 2023
Venice, CA

Respectfully submitted,

By: /s/ Stephen Doniger
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